

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

QUAD/TECH INC., a Wisconsin Corp.,
Plaintiff,

v.

Q.I. PRESS CONTROLS B.V. of The
Netherlands, AND

Q.I PRESS CONTROLS NORTH AMERICA
LTD., INC., a Rhode Island Corp.,
Defendants.

Civil Action No.: CV-10-2243 (CRB)

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE FIRST
CASE MANAGEMENT
CONFERENCE TO NOV. 5, 2010**

JURY TRIAL DEMANDED

Plaintiff Quad/Tech Inc. ("Quad/Tech") and Defendant Q.I. Press Controls North America LTD., Inc. ("QIPC NA") stipulate as follows.

1. The first case management conference in this action is currently scheduled for September 3, 2010.

2. Defendant Q.I. Press Controls North America, LTD., Inc. was served with the Summons, Complaint and Amended Complaint in this action on August 30, 2010.

3. The Plaintiff is in the process of effecting service on Q.I. Press Controls B.V. (of the Netherlands).

4. Because of the date on which QIPC NA was served with the Summons in this action, the parties have not been able to meet their obligations prior to the first case management conference as proscribed by the Court's Order Setting Case Management Conference, Federal Rule of Civil Procedure 26, and the Local ADR Rules.

1 5. For these reasons, the Plaintiff and Defendant QIPC NA request a 60-day
2 continuation of the case management conference to allow the parties to meet these
3 obligations.

4 6. Accordingly, the Plaintiff and Defendant QIPC NA respectfully request that the Case
5 Management Conference previously set for September 3, 2010 be continued until November
6 5, 2010.

1 Dated: September 1, 2010

THE BERNSTEIN LAW GROUP, P.C.

2
3
4 by: /s/
Alice C. Garber

5 Frederick A. Tecce (proceeding *pro hac vice*)
6 Email: ftecce@mcshea-tecce.com
McSHEA \ TECCE, P.C.
7 The Bell Atlantic Tower - 28th Floor
1717 Arch Street
8 Philadelphia, Pennsylvania 19103
Telephone: 215-599-0800
9 Facsimile: 215-599-0888

10 Jason Pauls (proceeding *pro hac vice*)
11 Email: jason.pauls@qg.com
Intellectual Property Counsel
12 Quad/Tech, Inc.
N63 W23075 State Highway 74
Sussex, WI 53089-2827
13 Telephone: 414-566-4408
Facsimile: 414-566-2011

14 Marc N. Bernstein (CA SBN 145837)
15 Email: mbernstein@blgrp.com
Alice C. Garber (CA SBN 202854)
16 Email: agarber@blgrp.com
THE BERNSTEIN LAW GROUP, P.C.
17 555 Montgomery Street, Suite 1650
San Francisco, California 94111
18 Telephone: 415-765-6633
Facsimile: 415-283-4804

19 **Attorneys for Plaintiff Quad/Tech Inc.**

20
21
22 MORRISON & FOERSTER LLP

23 By: /s/
24 Marc David Peters

25 **Attorneys For Defendant**
26 **Q.I. Press Controls North America Ltd., Inc.**
27
28

ATTESTATION OF CONCURRENCE

I, Alice C. Garber, as the filer of this stipulation, attest that I have obtained the concurrence in the filing from counsel for QIPC NA.

Dated: September 1, 2010

/s/
Alice C. Garber

IT IS SO ORDERED that the case management conference previously scheduled for September 3, 2010 be continued to November 5, 2010.

CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE